

Christopher M. Heimann Executive Director -Senior Legal Counsel AT&T Services, Inc. 1120 20th St., NW, Suite 1000 Washington, D.C. 20036 Phone (202) 457-3058 christopher.heimann@att.com

November 29, 2016

Ms. Marlene Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington DC 20554

Re: Cable Special Relief Petitions; MB Docket No. 15-71

Dear Ms. Dortch:

Consistent with the Market Modification docket referenced above, attached are results for a preliminary evaluation of a potential market modification for stations WTTO, WVTM, WBRC, WIAT, WBIQ and WABM-DT in Lamar County, AL

If you have any questions, feel free to contact me at (202) 457-3058.

Sincerely,

/s/ Christopher M. Heimann



November 22, 2016

Via FedEx

Robert B. Aderholt Member of Congress Room 247 1710 Alabama Avenue Jasper, AL 35501

Dear Congressman Aderholt:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for **Lamar County**, **AL**.

DIRECTV's engineering staff was given the areas to evaluate for stations **WTTO, WVTM, WBRC, WIAT, WBIQ, and WABM-DT (ABC)**(sister station of WBMA (ABC), which DIRECTV does not carry) on our **Birmingham, AL** spot beams, and have found that:

- DIRECTV's SD spot beam covers all current zip codes in Lamar County
- DIRECTV's HD spot beam covers all current zip codes in Lamar County

Please see attached for specific spot beam zip code coverage information. DIRECTV will forward the results of this preliminary evaluation to the FCC for their records.

Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

	name is <u>Phil</u>			SVP of Engineering	at DIRECTV. As
such, I a	am responsible	for determi	ning service areas	s for television stati o ns carrie	ed on DIRECTV's spot beams.
	CTV has reviev indicated.	ved the requ	est to add the co	mmunities listed below to th	e local television market for the
	Station	State	County		
	WTTO	AL	LAMAR	STORY OF THE THE COLOR OF THE C	madau sarenau (m. 1909).
	specific perfor a. The measu b. Estimated c. Estimated d. The amou	mance criter ared perform atmospherion levels of inte nt of capacit	ia. The following nance of the spot ceffects for receperference. y currently used,	ode associated with this required factors have been included beam covering this Television of the signal. and reasonably expected to television stations offered or	n Station's local market. be used, on the spot beam.
	n this analysis, service in the a. Signal avai b. Clear sky s c. Total carr	zip code(s) ir lability. signal margin	n question:	wing metrics, which it has us	sed to evaluate the potential to
			•	ally the same manner and us in which it currently offers s	ing substantially the same tations carried on the spot beam
6. Base	☐ HD ☐ SD C of the sign ☐ HD ☐ SD C of the sig	an provide so annot provic nal does not annot provic	ervice to all the zi le service to any meet the minimu le service to some meet the minimu		request because reception
	PORTANT: SD on oved from sei		no longer be ava	ilable after 2018/2019 wher	the existing MPEG 2 satellite is
	ed on	/ /		g is true and correct.	

1. My name is Phil Goswitz . I am SVP of Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.								
	2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.							
	Station	State	County					
	WBIQ	AL	LAMAR					
 3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis: a. The measured performance of the spot beam covering this Television Station's local market. b. Estimated atmospheric effects for reception of the signal. c. Estimated levels of interference. d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam. e. The target availability figure used for all television stations offered on the spot beam. 								
 From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question: a. Signal availability. 								

b. Clear sky signal margin.

- 5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
- - * IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

Signature

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2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County	0.2
WBRC	AL	LAMAR	

- 3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
 - a. The measured performance of the spot beam covering this Television Station's local market.
 - b. Estimated atmospheric effects for reception of the signal.
 - c. Estimated levels of interference.
 - d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - e. The target availability figure used for all television stations offered on the spot beam.
- 4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
 - a. Signal availability.
 - b. Clear sky signal margin.
 - c. Total carrier-to-interference ratio.
- 5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
- 6. Based on this analysis, DIRECTV:

■HD ■SD Can provide service to all the zip codes associated with this request.*

☐ HD ☐ SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.

 \square HD \square SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

* IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

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Station	State	County	
WIAT	AL	LAMAR	

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* IMPORTANT: SD cover removed from service		ilable after 2018/2019 wh	en the existing MPEG 2 satellite is				

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